

Local Agencies



PUBLIC WORKS
on Wickstrom, P.E.
tor of Public Works

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220 Fourth Ave. S.
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February 4, 2003

Bonneville Power Administration
Public Affairs Officer - KC -7
P.O. Box 12999
Portland, OR 97212

**RE: KECN - Kangley - Echo Lake Transmission Project
DOE/EIS 0317-S1**

Dear Sirs,

Thank you for the opportunity to provide comments on the proposed alternatives for the Kangley - Echo Lake Transmission Line Project, Supplemental Draft Environmental Impact Statement (EIS). The City of Kent supports your decision to proceed with Alternative 1 as outlined in the EIS.

As you are aware, the City of Kent utilizes groundwater and surface water rights to provide municipal water supply to the citizens of the Kent area. Clark's Springs, located near the Four Corners area of Maple Valley, provides over 60% of Kent's Water supply. BPA transmission lines are present on the Clark Springs property, with additional lines proposed under Options A. Option A also would traverse the city owned Kent Springs property, another source of municipal water supply for the City of Kent.

As required by the 1986 amendments to the Safe Drinking Water Act and the Washington State Drinking Water Regulations (WAC 246-290-135), the City of Kent completed a Wellhead Protection Program which identified the Wellhead Protection Area (WHPA). The WHPA covers a majority of the southern portion of Alternative A between the Covington and Raver Substations and the southern portion of Option C. This also includes the WHPA for Covington Water District which provides municipal water to the Covington and Maple Valley areas. The aquifers in the WHPA are very shallow and unconfined, making them very susceptible to contamination. Concern exists regarding the maintenance effects of the BPA easements on the groundwater supply within these WHPAs. This information is documented in the City of Kent Wellhead Protection Program forwarded to you in September of 2001. In addition, copies have recently been forwarded to your consultants CH2M Hill and Shannon and Wilson.

Rock Creek flows through the Clark Springs facility and is an important natural resource, not only for the City of Kent municipal water supply, but also for anadromous fish populations, including sockeye, coho, steelhead and cutthroat trout. Alternative A would add an additional set of tower structures which would require

KELT-1447

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1447-001 Comments noted.

1447-002 The City of Kent groundwater supply area has been addressed in the SDEIS. Additional information has been provided in Shannon and Wilson Inc.'s letter to BPA dated January 16, 2003. See Appendix Y.

1447-003 See response to Comment 1447-002.

1447-004 and -005 See response to Comment 1447-002.

1447-006, -007, and -008 Comment noted. Documented anadromous fish use of Rock Creek, a tributary to the Cedar River at river mile 18, includes Chinook salmon, Coho salmon, and sockeye salmon per the Washington Department of Fisheries - A catalog of Washington stream and salmon utilization, Volume 1, Puget Sound (1975), and fish use information available at Stream Net (<<http://www.streamnet.org>>) accessed March 2003. Sockeye are considered to be present only within the main stem of the Cedar River.


1447-010 | removal of vegetation around the stream, potentially impacting the anadromous fish populations,
 1447-011 | altering the large wetland found on the City of Kent property and potentially altering localized
 1447-012 | hydrology. The City of Kent is currently developing a Habitat Conservation Plan for the Clark
 1447-013 | Springs facility under the provisions of the Endangered Species Act. The HCP will include an
 evaluation of land use impacts on the stream system, anadromous fish populations and their habitat.

1447-014 | Less than a mile east of Clark Springs property, the Landsburg Mine is present (Sec 24 and Sec 25,
 T 22 N, R 6 E, WM). The mined section, Rogers Coal Seam, was mined to a depth up to 750 feet.
 Subsidence of the overburden left a trench roughly 60-100 feet wide, 20-60 feet deep, and
 approximately 3/4 mile long. This trench was subsequently used in the late 1960s to early 1980s
 for disposal of industrial wastes, and construction and land clearing debris. Drums, and liquids
 from tanker trucks were disposed in the northern portion of the trench. The Landsburg Mine site is
 currently under an Agreed Order with the Department of Ecology to clean up the former mine site.
 1447-015 | The mine is relevant as Alternative C is located adjacent to the former mine. We are concerned
 about the impacts any high voltage power lines may have on the various contaminants dumped in
 the Landsburg mine and the potential effects on groundwater quality.

1447-016 | The City of Kent strongly favors Alternative 1 as proposed by the Bonneville Power
 Administration, and we do not favor the alternatives that would create some potential impacts to
 1447-017 | the City of Kent property, the municipal water supply, or the natural resources found within the
 City's watersheds.

We look forward to working with you to manage our regional natural resources.

Sincerely,



Don Wickstrom, P.E.
 Public Works Director

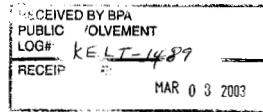
c: Mr. Kelly Peterson, Wellhead Protection Engineer
 Mr. William Wolinski, Environmental Engineering Manager
 Mr. Brad Lake, Water Superintendent
 Mr. Patrick Fitzpatrick, Deputy City Attorney
 Mr. Tom Brubaker, City Attorney
 Mr. Judy Nelson, Covington Water District
 Mr. Gene Lynard, Bonneville Power Administration
 Ms. Cindy Custer, Bonneville Power Administration
 File

1447-009, -010, and -011 BPA would site its transmission facilities (towers and access roads) to minimize sensitive resources such as streams and wetlands. BPA avoids these resources where it can, spans them where it can't avoid them, and mitigates if it can't span them. Impacts to the fishery resource are expected to be low to moderate, the same as with the Proposed Action, and the impact to wetlands are expected to be moderate with 17 acres of wetlands affected. The impact to groundwater is expected to be moderate to high. The wells under the City of Kent's wellhead protection program are considered highly susceptible to groundwater contamination.

1447-012 and 1447-013 Comment noted.

1447-014 and -015 The location of the Landsburg Mine adjacent to Alternative C is discussed in the SDEIS, Section 4.1.5.1 Settlement Hazard and its location shown on Sheet C-1 of Figure 5B of Appendix M. The transmission line ROW would be approximately 500 feet to the east of the mine trench that has been used as a disposal site. We have no evidence of harmful interactions between higher levels of electromagnetic radiation (EMR) on toxic wastes and groundwater quality.

1447-016 and -017 Comments noted.



February 27, 2003

Bonneville Power Administration
Public Affairs Office-KC
PO Box 12999
Portland, OR 97212

RE: Kangley-Echo Lake Transmission Line Project

To whom it may concern:

King County Department of Development and Environmental Services (DDES) has completed its review of the Supplemental Draft Kangley-Echo Lake Transmission Line Project. King County DDES focused primarily on impacts to the natural environment, specifically project impacts related to wetlands, streams, and fish and wildlife.

As specified in previous comment correspondence, King County's Sensitive Areas Ordinance (SAO), KCC 21A.24, only allows for the alteration of wetland, and wetland and stream buffers for specific permitted alterations or under provisions of a Reasonable Use Exception, KCC21A.24.070, or Public Agency or Utility Exception (PAUE), KCC 21A.24.070A. The PAUE is code applicable to your situation for the proposed project.

Alternatives Analysis/Sensitive Areas Review/Mitigation

King County DDES understands that the BPA proposes to build a single-circuit 500-kV transmission line from a tap point on an existing 500-kV line near Kangley, Washington to its Echo Lake substation near North Bend, Washington. The preferred alternative for this line, also called Alternative 1, is nine miles long. Five miles of the proposed route would go through the Cedar River Municipal Watershed. In addition, Echo Lake substation would be expanded by about three acres to the east and new equipment would be installed to accommodate the new line.

Based on review of Kangley-Echo Lake Transmission Line Project Supplemental Draft Environmental Impact Statement, the preferred alternative cannot meet all provisions of

1489-001 Comment noted.

Section 21A.24.070 of the King County Code provides for an agency or utility to apply for an exception to the Sensitive Areas Ordinance, if the application of this chapter would prohibit a development proposal by a public agency and utility.

As a federal government agency, BPA is prevented from applying for a local government permit, including an exception to a local government code. Since Congress has not waived sovereign immunity with respect to local zoning ordinances, BPA is prevented from complying with the County's procedural requirements. Although we do not comply with the procedural provisions of local government code, we do comply with the substantive intent of local government law, and we feel we have done so in minimizing impacts to sensitive resources to the maximum extent possible.

BPA as a federal agency does not apply for county permits, but would meet the equivalent of county requirements where feasible. Due to the nature of a transmission line, it is not possible to not impact riparian areas along streams and rivers and wetlands and their buffers. In order to keep a transmission line reliable, tall-growing species of trees need to be cut within riparian and wetland areas. BPA is proposing to compensate by planting/seeding low-growing plant species back where taller trees would have been taken. In addition BPA would purchase, or fund the purchase of, other properties (just for the Kangley-Echo Lake Project Alternative 1). BPA's intention is to convey the land to the City of Seattle for long-term protection. If all or part of the property is found to be unsuitable for mitigation of habitat loss, BPA intends to sell those portions of the property considered unsuitable for this purpose. In this case, BPA would sell the property subject to a restriction prohibiting residential or commercial use. The prohibition of commercial use would not include timber growing and harvesting, which would continue to be an allowable use.

BPA understands that the King County Code recognizes that utility corridors must cross sensitive areas in order to provide

the King County Sensitive Areas Code (21A.24). However, the King County's Sensitive Areas Code recognizes that utility corridors must cross sensitive areas in order to provide service to King County residents. The Code allows utilities in wetland buffers (KCC 21A.24.330.E), in stream buffers (KCC 21A.24.370.D), and across streams (KCC 21A.24.370.G), subject to certain criteria. Crossing wetlands with utilities is not a permitted alteration. The proposed clearing and/or filling in wetlands and in wetland and stream buffers requires a Public Agency Utility Exception (PAUE) for the construction of the transmission lines (KCC 21A.24.070.A). These Code citations are included in this letter by reference.

The criteria for authorizing PAUE's as set forth in KCC 21A.24.070.A(2) are identified below:

1489-001

The department shall review the application based on the following criteria: there is no other practical alternative to the proposed development with less impact on the sensitive area; and the proposal minimizes the impact on sensitive areas.

An analysis of alternatives to the project is required in order to approve a PAUE. Administrative Rule 21A-24-025 specifies criteria for DDES' evaluation of an alternatives analysis for a PAUE. DDES shall review the applicant's evaluation of alternatives, needs and objectives, the nature of the project, and the other factors set forth in subsection A of the rule, to determine if there is a practical alternative that would satisfy the purpose and need for the project and result in less impacts to the sensitive area and buffer. DDES shall determine that there is no practical alternative only if it concludes that the basic purpose of the project cannot practicably be accomplished using a project or non-project alternative, an alternative location, or an alternative construction technique that would avoid, or result in less adverse impacts on, a sensitive area or its buffer.

1489-002

The Bonneville Power Administration (BPA) performed an Alternative Transmission Line Routing Analysis for the Kangley-Echo Lake Transmission Line Project (DEIS June 2001 and SDEIS January 2003). Alternative project routes and design and construction methods were considered, and this study provided optimum routes for the corridors associated with the Project. The factors weighed in evaluating various routes for the transmission lines: use of existing corridors, community impacts, environmental impacts, construction factors, and system reliability.

King County DDES has noted that impacts to wetlands and streams have been minimized through the design and review process. Because the preferred route (Alternative 1) would parallel an existing 500-kV transmission line, compared to the other action alternatives, clearing would be minimized and the need to construct additional access roads (2.9 miles of new access road) would be reduced. Additionally, 0.6 miles of access road would be removed from service.

services to King County residents, that crossing wetlands is not a permitted alteration, and that a utility/public agency must apply for a public agency/utility exception. Please see previous response.

As a federal government agency, BPA is required to prepare an environmental impact statement (EIS) under the National Environmental Policy Act before making a decision on any major federal action, such as adding a 500-kV transmission line to BPA's main grid.

BPA has prepared a SDEIS, identifying the impacts of nine build alternatives, non-transmission alternatives and a No Action Alternative. As a part of this analysis, BPA identified how those impacts could be mitigated.

In addition to the best management practices, BPA proposes to offer 473 acres in compensatory mitigation to mitigate for the loss of approximately 90 acres of habitat for the northern spotted owl, and for alteration of 14 acres of forested wetlands to nonforested scrub/shrub wetlands within unincorporated King County. The 473 acres of compensatory mitigation would be located immediately north and immediately south of the Cedar River Municipal Watershed.

1489-002 Comment noted.

1489-003 Comment noted.

BPA has completed a wetland delineation report, dated March 28, 2002, which has been sent to you.

For a complete review of all streams proposed to be crossed under project Alternatives A, B, C (Options C-1 and C-2), and D (Options D-1 and D-2), please see Appendix N of the SDEIS. Revised Appendix A – Table A-1 of the Final Fisheries Technical Report (see Addition to Appendix A in the FEIS) contains this information for Alternatives 1-4. For a complete list of streams

1489-003	<p>The BPA identified mitigation measures that would be utilized under any of the proposed action alternatives. These mitigation measures include, but are not limited to, use of special design elements and construction techniques, season restrictions on construction, supervised erosion control practices, purchasing land as replacement habitat for habitat affected by the project, wetland mitigation including careful cutting and removal of only vegetation that are tall-growing species, reseeding where vegetation has been removed, and purchase of lands that contain wetlands, streams, and upland habitats.</p> <p>Under the action alternative review, King County DDES noted that, with the exception of Alternatives B and D, similar impacts on wildlife identified under all alternatives, however, it was noted that overall, the least amount of vegetation disturbance would occur under the Preferred Alternative (Alternative 1). Additionally, under Alternative 1, a total of 14 acres of wetland would be impacted. Impacts to the 14 acres of wetland only include vegetation disturbance, and the primary impacts would include the conversion of forested wetlands to scrub/shrub and emergent wetlands. Fewer acres of impacts to wetlands were noted under some of the other action alternatives; however, as stated previously, overall land area impacts under the other action alternatives were greater. With the exception of Alternatives B and D, impacts to fisheries and stream resources were identified as being similar under all the action alternatives. At this time, however, it is not clear exactly how many streams and of what type are proposed to be crossed under each of the alternatives.</p> <p>It is understood that mitigation for environmental impacts will include minimization during project construction and operation, limited on-site mitigation, and that most impacts will be primarily mitigated off-site. It is also understood that the off-site mitigation options are still being finalized.</p>
1489-004	<p>Overall, based on the provided alternative analysis, it appears that King County DDES could support the Preferred Alternative (Alternative 1). However, BPA has not supplied sufficient documentation to establish conditions and mitigation measures to insure the proposed project will mitigate impacts on streams, wetlands, and associated buffers, and fish and wildlife.</p> <p>Under the selected alternative, the BPA will need to:</p>
1489-005	<ol style="list-style-type: none"> 1) Accurately quantify impacts to streams, wetlands, and their buffers. To facilitate quantification of impacts, the BPA will need to delineate and classify wetlands (KCC 21A.06.1415) and streams (KCC 21A.06.1240) within 100-feet of the proposed right-of-way. Based on the classification of wetland and streams, their location, and buffer requirements, impacts to wetland, streams and their buffers would need to be quantified. 2) Mitigation will be required for alteration of wetlands, streams, and their buffers. The PAUE process does allow some flexibility in mitigation; however, mitigation should be consistent with the following King County regulations:

to be crossed in association with the Preferred Alternative, please refer to Tables 3 and 5 within the Final Wetland Delineation Report, Kangley-Echo Lake Transmission Line Project (March 28, 2002).

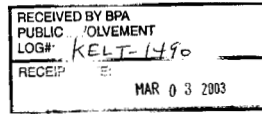
1489-004 See response to Comment 1489-003.

1489-005 BPA has purchased 350 acres in the Raging River Basin and may purchase or fund the purchase of other properties that could be used for compensatory mitigation to mitigate for the unavoidable impacts to sensitive resources. These properties may achieve greater biologic and hydrologic conditions, as called for by KCC 21A.24.340, than would result without the project.

BPA anticipates no alteration to streams; however, stream buffers would be impacted, as allowed by King County Code.

	<p>Per KCC 21A.24.340, all alterations on wetlands shall be replaced or enhanced on the site or within the same drainage basin using the following formulas: Class 1 and 2 wetlands on a 2:1 basis and Class 3 Wetlands on a 1:1 basis with equivalent or greater biologic functions. Replacement or enhancement off the site may be allowed if the applicant demonstrates to the satisfaction of King county that off-site location is in the same drainage sub-basin as the original wetland and that greater biologic and hydrologic conditions will be achieved.</p>
1489-005	<p>Per 21A.24.380, replacement or enhancement shall be required when a stream or buffer is altered pursuant to an approved development proposal. There shall be no net loss of stream functions on the development proposal site, and no impact on stream functions shall occur from the approved alterations. Replacement or enhancement for approved stream alterations shall be accomplished in streams on the site unless the applicant demonstrates to the satisfaction of King county that: 1) enhancement or replacement on the site is not possible, 2) the off-site location is in the same drainage sub-basin as the original stream, and 3) greater biologic and hydrologic functions will be achieved.</p>
1489-006	<p>3) Monitoring of the mitigation measures shall be required for five years following installation as specified on the approved plans, to evaluate whether or not the project performance standards have been met.</p> <p>Should you need to discuss this information further, please feel free to call me at 206-296-7392.</p> <p>Sincerely,</p> <p>Bill Kerschke Environmental Scientist III</p>

1489-006 BPA understands King County requirements and would meet those requirements where feasible including monitoring.



February 28, 2003

Bonneville Power Administration
Communications Office – KC-7
P.O. Box 12999
Portland, Oregon 97212
email: comment@bpa.gov

RE: Kangley-Echo Lake Transmission Line Project

- 1490-001 I am writing on behalf of the City of North Bend to comment on the Kangley-Echo Lake Transmission Line Project Supplemental Draft Environmental Impact Statement (SDEIS).
- 1490-002 The City is in support of the SDEIS conclusion that Alternative 1, a new single circuit 500 –kV transmission line routed through the Cedar River Municipal Watershed, would have the least environmental and fiscal impact. The City notes that Alternative 1 provides substantially increased environmental mitigation measures to protect the Cedar River Watershed, at a significant cost to the BPA customers. If similar care were taken to protect the environment on any of the other alternatives evaluated in the SDEIS, the cost of those alternatives would be significantly higher. The potential increase in cost to mitigate routes other than Alternative 1, to the same mitigation standards proposed for Alternative 1, should be evaluated in the Supplemental Final Environmental Impact Statement.
- 1490-003 The City is not in support of Alternative B, rebuilding the Rocky Reach-Maple Valley-345 kV to Double Circuit 500-kV from East of Stampede Pass to the Echo Lake-Maple Valley lines. Alternative B would result in a replacement of the existing 150-foot tall towers with 180-foot tall towers. The change would create a significant increase in the visibility of the transmission line from the City of North Bend, adversely impact the Rattlesnake Mountain Scenic Area south of North Bend, and adversely impact the scenic value of the Mountains to Sound Greenway, for the length of the new line. Access routes required for reconstruction of the line could adversely impact the Forster Woods subdivision located south of Interstate 90 in North Bend.
- 1490-004 Similarly, the City is not in support of Alternative D, constructing a new Single-Circuit 500-kV line west of the Cedar River Watershed to the Echo Lake- Maple valley lines. As proposed in the SDEIS, the new 500-kV line would be located adjacent to the existing

1490-001 and -002 Comment noted. Please see response to Comments 1420-001 and -002.

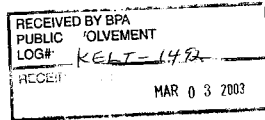
1490-003 Comment noted.

1490-004 and -005 Comment noted.

1490-004	150-foot tall Rocky Reach-Maple Valley-345 kV running from east of Stampede Pass to the Echo Lake-Maple Valley lines. Alternative B would result in clearing another 150-foot wide right of way and constructing a new set of 180-foot tall towers next to the existing 150-foot tall Rocky Reach-Maple Valley-345 kV towers. Alternative D would also create a significant increase in the visibility of the transmission line from the City of North Bend, adversely impact the Rattlesnake Mountain Scenic Area south of North Bend, and adversely impact the scenic value of the Mountains to Sound Greenway for the length of the new line. Access routes required for construction of the new line could adversely impact the Forster Woods subdivision located south of Interstate 90 in North Bend. Additionally, the 150-foot wide clearing required for Alternative D could adversely impact the streams, steep slopes and geologically unstable ground above the Forster Woods development. The City experienced significant flooding and sedimentation problems from the streams eroding the unstable ground on the north slope of Rattlesnake Ridge in 1996. The City strongly opposes any action that would adversely impact the stability of the hillside and increase runoff and sedimentation in the streams on the North slope of Rattlesnake Ridge.
1490-005	
1490-006	
1490-007	<p>For the reasons outlined above the City is would favor implementation of Alternative 1, a new single circuit 500 –kV transmission line routed through the Cedar River Municipal Watershed, because it would have the least environmental and fiscal impact, based on the information contained in the SDEIS.</p> <p>Thank you for the opportunity to comment.</p> <p>Sincerely,</p> <p>Laurence Stockton, Community Services Director</p> <p>Copy</p> <p>Mayor Council City Attorney City Administrator</p>

1490-006 Comment noted.

1490-007 Comment noted.



March 1, 2003

Lou Driessen, Project Manager
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

Subject: Comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Kangley-Echo Lake Transmission Project. Reference number: T-DITT-2.

Sent via e-mail to: comment@bpa.gov

Dear Mr. Driessen:

Seattle Public Utilities (SPU) is responsible for providing drinking water to 1.3 million customers in urbanized areas of western King County and the southern portion of Snohomish County. SPU takes approximately two-thirds of this drinking water from the Cedar River. SPU owns the 90,346-acre Cedar River Municipal Watershed (CRW) and manages its land and aquatic resources for water supply, the protection and restoration of fish and wildlife habitat, and the protection of cultural resources. SPU's companion utility, Seattle City Light, owns and operates a hydroelectric facility and associated transmission lines in the Watershed.

This letter provides SPU's comments on BPA's Supplemental Draft EIS (SDEIS) for the Kangley-Echo Lake Transmission Project. SPU provided comments during the scoping for the Draft EIS (DEIS) in letters to BPA dated April 28, 2000, and October 2, 2000. SPU also provided comments during the comment period for the DEIS on September 4, 2001. SPU provided comments to BPA on the scoping of this SDEIS in a letter dated July 22, 2002. To the extent applicable, these comments are incorporated herein by this reference.

SPU has the following major points on the SDEIS. Additional details for these points and others are included below.

- The purpose and need for this project should be clearly and completely described in the SDEIS.

Dexter Horton Building, 10th Floor, 710 Second Avenue, Seattle, WA 98104
Tel: (206) 684-5851, TTY/TDD: (206) 233-7241, Fax: (206) 684-4631

An equal employment opportunity, affirmative action employer, Accommodations for people with disabilities provided upon request.

1492-001 Comment noted.

See responses to Comment Letter 394.

1492-002 Please see Chapter 1 of the SDEIS.

1492-003 Please see Chapter 1 of the SDEIS. Please see responses to Comments 340-002, 1415-003, and -004.

1492-004 BPA has worked closely with the City of Seattle to develop construction measures and stormwater pollution controls to minimize water quality impacts from construction of the project. From the onset, BPA designed the project, including placement of roads and towers, to avoid all sensitive areas, to the maximum extent feasible. To address unavoidable impacts, BPA is in the process of acquiring and protecting compensatory mitigation properties adjacent to the CRW that will help reduce future impacts to the CRW from potential development. We also intend to implement new turbidity monitoring devices in the CRW to increase awareness of when the water supply system may need to temporarily shut down to protect City water customers due to turbidity. Finally, we are acquiring insurance coverage for unforeseen events (caused by BPA's construction or operation and maintenance of the transmission line), which would trigger new environmental requirements. We believe we are taking extraordinary steps to address the concerns raised by the comment.

1492-005 Please see the mitigation listed for each of these resources in the SDEIS. Also please see responses to Comments 340-002, 1415-003, and -004.

1492-006 A Summary of Transmission Planning Studies is provided in Appendix H (available on request). BPA did a comprehensive evaluation of transmission infrastructure needs which is summarized in "BPA Infrastructure Projects, February, 2003," available at http://www.bpa.gov/Corporate/KC/home/keeping/03kc/KC_Infrastructure.pdf. A variety of alternatives were identified to address the particular purpose and need, including reconfiguration of existing lines in the Puget Sound area. The alternatives are described in Chapter 2 of the SDEIS.

- 1492-003 • SPU opposes construction of this transmission line through the CRW unless the impacts on the Watershed can be fully mitigated and the City and its water customers can be fully protected and compensated. The SDEIS should include an analysis of all potential impacts to the CRW, explain how they would be addressed and mitigated, and indicate how SPU and its customers will be protected from the associated potential harm.
- 1492-004 • BPA should carefully evaluate the potential impacts on drinking water (particularly during construction) of any routes through the CRW and indicate how SPU and its water supply customers will be protected from the associated potential harm.
- 1492-005 • Measures to mitigate for impacts to natural, social, and cultural resources should be described in the SDEIS, and those measures should fully mitigate for any unavoidable adverse impacts caused by the construction and operation of the transmission line.

PURPOSE AND NEED

- 1492-006 The SDEIS should thoroughly explain the purpose and need for the proposed action. It is unclear from BPA's previous statements and documents why the proposed routes or the infrastructural choice embodied by them can alone fulfill the BPA's more general grid objectives for redundancy, or why a proposed action on any other of BPA's eleven other major high-voltage transmission lines serving the Puget Sound area could not meet the stated objectives with less environmental impact. The SDEIS would benefit from a detailed explanation of the electrical transmission system serving the Puget Sound area that supports the necessity of the proposed action, and BPA should consider referencing system plans or a regional analysis (along with a description of other improvements BPA is considering in the near and distant future) so the reader can understand why this specific, relatively short link in a much larger system is necessary. In short, BPA should explain how the risk of failure of the existing BPA transmission line in the Watershed justifies the need for an additional transmission line to be built in the Watershed.
- 1492-007 The SDEIS should also clarify who, specifically, would benefit from the electricity transmitted through this line. Some members of the public may believe that citizens of Seattle will most benefit from this project. In Section 2.3.5, what does "to make profits in the lucrative short- and near-term markets" mean exactly? BPA's own public statements suggest the Northwest will not be the major beneficiary of this project, due to Canada's plans to wheel the energy it receives from the Canadian Entitlement through this new project to California and other southern-tier states. The SDEIS should clearly state which countries, states, and energy markets will benefit from this project and how they will benefit. BPA must have some idea what Canada plans to do with the power it receives at Blaine because that power would be wheeled over BPA's transmission infrastructure if it is to be sold back to US markets. The SDEIS should describe these destinations and the parties benefiting from that power.
- 1492-008 In an advance copy of the SDEIS [p. 1-4 (box) (5-year planning timeframe) and p. 10: Section 1.7], BPA stated "...studying whether another transmission line between the Echo Lake Substation and Monroe-Echo Lake substation..." This project is not mentioned in the publicly released SDEIS, but should be. Combining two or more projects (such as rebuilding

- 1492-007 The primary beneficiaries are consumers in the Puget Sound Area and in British Columbia served by retail utilities that take service over the BPA transmission grid. This essentially represents all residential, commercial and industrial consumers in the area. For information on the Canadian Treaty, please see Section 1.2.2 of the SDEIS, Appendix I and response to Comments 1422-002-001, 1422-002-002 and 1421-031-001. Consumers in the Puget Sound Area directly benefit from the Treaty. We believe that Canada may "make profits in the lucrative short- and near-term markets" mostly in the spring and summer, not in the winter when this problem occurs.

- 1492-008 The reference to this line was changed in the SDEIS for security reasons.

BPA has included in its planning any future potentials for any alternative. This Kangley-Echo Lake project cannot be included with any future alternative. In fact, in the early 1990s, BPA did a project that would have produced a new 500-kV line across the Cascade Mountains into the King County area and also the Kangley-Echo Lake project. Through the then environmental/NEPA process, BPA determined that the "Cross-Mountain" portion of the project and the Kangley-Echo Lake portion could be delayed by construction of a new substation, called Schultz, in the Ellensburg area, and through targeted conservation. Also it was determined that if another line is needed across the Cascade Mountains, then it would likely be needed north of Seattle in the Monroe area and not in the Echo Lake Substation area. BPA has tentatively determined that the next cross-Cascade line is needed in 2010, but that date could be substantially affected by the rate of load growth and new generation west of the Cascade Mountains. Therefore Alternative B and D likely will have no advantage to future projects and cannot combine economical resources. BPA has also acknowledged in the current Kangley-Echo Lake SDEIS that Alternatives A and C would use a vacant 500-kV circuit on their north end to get into Echo Lake Substation. BPA has plans to use this vacant circuit sometime in the near future as growth in King County continues. When the need arises to use these

1492-008 the 50-year old 345 kV Rocky Reach-Maple Valley line over Snoqualmie Pass or building another 500kV on the Maple Valley-Echo Lake Alternative A) with a new 500 kV line could alter the “prefer-ability” among current project alternatives and present valuable opportunities for cost savings over the long term. Why are these future projects for these lines not being considered for design and construction simultaneously with the needed 500kV line? If the reason is that BPA’s planning horizon is “five to seven years” [SDEIS p. 1-4 (box)], then this would be inconsistent with BPA’s previous actions on other projects. That is, BPA has previously invested resources for the long-term without knowing the complete future picture (e.g. WPPPS and Trojan). Such an investment (designing and constructing two projects in concert) would appear to offer cost advantages in this case, considering even conservative estimates of growth in Western Washington. The SDEIS should completely describe all short- and long-term planned system upgrades, reconstruction, and new construction for all transmission facilities in and near the project area, and describe why BPA has not investigated design solutions involving the reconstruction/upgrade/construction of two or more transmission lines in concert as project alternatives.

RISK ASSESSMENT FOR “FAIL SCENARIOS”

1492-009 The SDEIS should include an explanation of how risks to power lines are calculated and used in defining system reliability standards and performance. This would provide a better context for BPA’s risk assessments for this project. For example, Watershed forests can be subject to extreme fire hazard, “microbursts” have historically leveled forests near the proposed project, and parts of the proposed line would be located on ancient landslide deposits. The SDEIS appears to take a superficial, simplistic risk evaluation approach that doesn’t fully justify selection of the proposed action in terms of reliability. BPA should address these potential risk issues in the SDEIS.

ALTERNATIVES EVALUATED IN THE SDEIS

1492-011 SPU appreciates the SDEIS’s inclusion of alternative routes located outside the CRW. However, it is not clear why the four alternatives (besides the proposed action) that cross the Cedar River Watershed (CRW) are still being analyzed and considered in the SDEIS. These superfluous alternatives are distracting and don’t bring any significant information to light. In addition, the SDEIS fails to provide detailed cost estimates for all alternatives while still using project costs to evaluate alternatives. The cost estimates associated with project alternatives are difficult to understand. The SDEIS needs to present a cogent and detailed description of cost estimates for all alternatives because BPA is using relative costs in the decision-making process for this project. It is difficult to assess if project costs are being “inflated.” For example, additional cost of mitigation for alternatives mixes standard and sound design and construction BMPs with “mitigation.” The BMPs should be considered standard elements of design and construction, not additional mitigation costs: use of erosion specialists and monitors for erosion control, use of temporary mats to cross wetland vegetation, use of special surveying techniques to minimize vegetation disturbance; use of special clearing criteria; restricting ground-disturbing activities to the dry season (Alternative 1); minimizing wetland impacts, use of special care and design for crossing fish-bearing streams (Alternative A). But, when actual compensatory mitigation actions are described, then these are not included in the mitigation costs across the board for other alternatives [e.g. measures needed for the

vacant circuits and either Alternative A or C is using this vacant circuit, then another transmission line would need to be constructed to replace the vacant circuit occupied by Alternative A or C. Other future projects are not in the same area and/or provide no benefits to this project, such as a possible future line from Echo Lake Substation to the north. BPA planned Kangley-Echo Lake as part of a broad examination of infrastructure needs, which is summarized in Infrastructure Keeping Current, February, 2003, available at http://www.bpa.gov/Corporate/KC/home/keeping/03kc/KC_Infrastructure.pdf.

See response to Comment 1492-006.

1492-009 and -010 The risks and criteria that BPA uses to plan the grid are summarized in Section 1.2.1 of the SDEIS and described in more detail in “Reliability Standards: meeting national and regional requirements for electric system reliability,” available at http://www.bpa.gov/Corporate/KC/home/keeping/03kc/KC_Reliability.pdf. BPA has over 30 years of experience with an existing transmission line in the CRW which has operated with acceptable reliability and without impact on the CRW.

1492-011 and -012 Comment noted. Please see response to Comments 1420-001 and -002.

1492-013 and -014 Please see response to Comments 1420-001 and -002.

1492-015 and -016 Please see response to Comments 1420-001 and -002. BPA would minimize and mitigate impacts to wetlands and other sensitive areas on any alternative. BPA would likely not purchase additional properties for impacts to sensitive areas outside the CRW.

1492-017 See response to Comment 382-026.

1492-018 The only alternative that has detailed engineering and engineering survey information available is the Proposed Action (Alternative 1). Due to the need to get the project energized as quickly as possible, BPA has taken the risk and

- 1492-014 | approximately 401 landowners potentially affected (What measures?; BPA already owns the
 1492-015 | ROW.) (Alternative A)]. Or, compensatory mitigation for wetland impacts and timber
 1492-016 | removed in sensitive/critical areas (Alternative B) (Why is this not included as mitigation for
 ALL alternatives, including Alternative 1?)

GENERAL COMMENTS ABOUT IMPACT ASSESSMENT AND MITIGATION

- 1492-017 | The SDEIS should disclose the significance of impacts. The DEIS and SDEIS use terms such
 as “low, medium, and high” to describe impacts. This may assist making relative comparisons
 among the alternatives considered, but it fails to identify whether or not these impacts are
 “significant.” Based on the NEPA regulations’ definition of “significant,” many of the
 impacts identified in the SDEIS would qualify. The SDEIS should disclose this information
 so that the public and other agencies, as well as decision-makers, have adequate information
 to review.

- 1492-018 | Also, the SDEIS should describe alternatives in sufficient detail to support evaluation of
 impacts and mitigation measures. Examples of important details might include clearing
 requirements, tower locations and designs, and access roads. This information would help in
 understanding potential impacts because in many aspects the alternatives may be reported to
 have very similar impacts. Further, providing the project details would help evaluate the
 effectiveness of proposed mitigation.

- 1492-019 | The landowner most affected by this project is the City of Seattle, and the impacts of the
 project are potentially greatest and certainly most complex for the Cedar River Municipal
 Watershed, especially considering: 1) the area is the region’s major drinking water supply, and
 1492-020 | 2) the land is being managed under a complex Habitat Conservation Plan (HCP) and
 associated legal commitments to the federal government. It is therefore especially important to
 the City that the SDEIS fully disclose potential environmental impacts so the public and
 decision-makers are able to make informed decisions regarding this proposed project.

- 1492-021 | Mitigation measures in the SDEIS should be committed to with reference to specific
 mitigation plans. Further, mitigation actions need to be clearly linked to making “significant”
 1492-022 | impacts “not significant,” which raises the question, again, of why the SDEIS does not use the
 traditional NEPA “significance” designations that most EIS’s and reviewers use to assess
 impacts and the proposed mitigation actions. For example, for the above reasons, it is not
 1492-023 | clear to SPU (from the SDEIS language) just exactly how the HCP would remain “intact and
 whole” (Section 5.5.8.5) if BPA’s project were allowed to pass through the CRW.

IMPACTS ON THE CEDAR RIVER WATERSHED

- 1492-024 | The Watershed is ecologically unique in the Puget Sound region. It includes some of the
 largest contiguous areas of older forest habitat (between 60 and 100 years old) at low-to-mid-
 elevation, areas that would be significantly impacted by alternatives 1 through 4. The
 Watershed is located in an area of the Cascade Mountains that has been identified by federal
 biologists as critical to the long-term survival of many species dependent on old-growth forest
 habitats. It is embedded in an area of checkerboard ownership in the central Cascades that is
 essential to dispersal of organisms between the north and south Cascades; the Watershed is a

gathered this information knowing that the Administrator could
 chose another alternative. If he chooses another transmission
 alternative, BPA would need another two or more years to
 energize this project. BPA understands that it is taking a
 financial risk investing in the preferred alternative beyond what
 BPA would normally do ahead of the Record of Decision.
 Other alternatives do not have this detailed information. For
 the other alternatives, BPA has used a worst case scenario, such
 as more clearing than would actually be necessary, including
 clearing at sensitive areas such as wetlands and creek and river
 crossings.

1492-019 and -020 Comment noted.

1492-021, -022, and -023 See response to Comment 382-026.

1492-024 Comment noted.

1492-025 Comment noted.

1492-026, -027, and -028 Comment noted.

BPA’s proposed transmission line would expand the existing
 150-foot wide right-of-way through the CRW to a 300-foot
 wide right-of-way. BPA did evaluate the impacts to vegetation
 (low to moderate), and for threatened, endangered or sensitive
 species (moderate).

1492-029, -030, and -031 Please see responses to Comments 1492-004
 and 1421-030-001. BPA has consulted with the USFWS and
 NMFS. Letters from NMFS were included in the SDEIS
 (Appendix U) and state that NMFS agrees with BPA’s
 determination of “may affect, but not likely to adversely affect”
 for Puget Sound chinook and their designated habitat.

1492-032, -033, and -034 Spills of fuel or hazardous materials in the CRW
 could impact groundwater that may eventually flow into the
 Cedar River. The potential for such spills would be greatest
 during construction. A spill response plan will be developed
 and incorporated into the SWPP Plan, as described in Section
 4.3.3.2 of the SDEIS. See response to Comment 394-139. In

- 1492-024 large block of protected forest that is a key element in this north-south habitat connectivity. The Watershed comprises two-thirds of the Cedar River Basin, and includes the headwaters of the major river supplying Lake Washington. The Cedar River includes some of the most important salmon habitat in the Lake Washington Basin.
- 1492-025 The SDEIS should take into account the growing local and regional importance of the CRW as wildlife and fish habitat, a wildlife movement corridor, and a refugium, amid urban development and extractive land uses. This role has a significant social and biological value that needs to be taken into consideration in evaluating the potential impacts of this project.
- 1492-026 SPU recently completed its Habitat Conservation Plan for the Cedar River Watershed under the federal Endangered Species Act (ESA). On April 21, 2000, the City of Seattle along with the National Marine Fisheries Service (NMFS) and the U. S. Fish and Wildlife Service (USFWS) signed the Implementation Agreement for this HCP and received the associated Incidental Take Permits under the ESA. The HCP and its implementing agreements represent the cutting edge, regionally and nationally, of applied ecosystem management principles and were the culmination of over six years of effort in building regional consensus on the future direction for the management of the terrestrial and aquatic resources of the Watershed.
- 1492-027
- 1492-028 The intensive public review for this HCP revealed broad public support for protecting the habitats in the Watershed and not creating more large openings in the forest by commercially harvesting timber. In response to this, the City decided to discontinue commercial timber harvest over the next 50 years. BPA's proposed routes through the Watershed would result in making large clearings in this important forested area. The local and regional consequences of the proposed large-scale fragmentation and removal of older forest in this sensitive area should be thoroughly evaluated in the SDEIS.
- 1492-029 In its scoping letters for the DEIS and SDEIS, SPU identified the need for BPA to address affects of the project on the HCP. SPU needs to be certain that the proposed project will not diminish the conservation value of the plan and that the City and its water supply customers will be fully protected.
- 1492-030 SPU believes that the proposed routes through the CRW could, unless adequately mitigated, have significant impacts on species protected under the Endangered Species Act, and on their habitat. Protected salmon species are expected to be present in the Alternative 1 through 4 project areas by the fall of 2003. These issues need to be carefully evaluated in the SDEIS, which should disclose and evaluate the extent to which the proposed routes through the CRW would affect the habitat of listed species. The SDEIS should also describe how BPA would protect the City from any possibility that the terms of the HCP will be violated.
- 1492-031
- 1492-032 **IMPACTS TO DRINKING WATER SUPPLY**
- 1492-033 Generally, the SDEIS downplays the regional significance and social function of the CRW as a municipal water supply. For example, Section 4.5 indicates that groundwater impacts for Alternative 1 would be low (despite the groundwater contributions to Cedar River flows upstream of Landsburg), while groundwater impacts for Alternative A would be high due to the City of Kent well-head protection area. The SDEIS must explicitly address the potential
- 1492-034 impacts of the proposed action on drinking water and the City's ability to provide that water to those who need it. Because the Cedar River source is unfiltered, SPU is required to control the Watershed in accordance with a Department of Health (DOH)-approved control program. Any crossing of the Cedar River and its tributaries in this area of mature forest could pose significant risks to the drinking water supply during construction. Construction activities have the potential to cause high water turbidity events that could result in exceedance of federal drinking water standards, and potentially result in the need for expensive water filtration that otherwise would not be needed or required. The SDEIS should disclose and evaluate these risks, and should describe how BPA will protect the City and its water supply customers from the associated potential harm. In addition, the SDEIS needs to present a more detailed discussion of federal and state drinking water quality regulations and constraints as they pertain to the CRW.
- 1492-035

general, impacts to groundwater that provide a sole drinking water source (City of Kent wellhead protection area) will be greater than impacts to groundwater that eventually drains to a surface water source of drinking water (CRW) due to shorter travel times and less dilution. Construction site impacts would be local and temporary. Tower sites would be isolated and away from stream crossings. Mitigation measures described in the DEIS and SDEIS would be used to reduce the potential of turbid water events. Water quality regulations are discussed in Sections 3.5.3 and 3.5.4 of the SDEIS and in letters from Shannon and Wilson, Inc. to BPA dated January 16, 2003 (see Appendix Y).

- 1492-035 Please see response to Comment 1492-004. Impacts to drinking water regulations have been discussed in the SDEIS. As mentioned above, BPA is proposing to extraordinary steps to minimize construction impacts to the CRW by designing the project to avoid impacts, by undertaking various best management practices to minimize harm, and by purchasing mitigation to compensate for those impacts that cannot be avoided. The mitigation should leave the CRW with a net environmental benefit. Moreover, BPA already has an existing 500-KV line that parallels the proposed line. The existence of the existing line offers convincing evidence that such a line is compatible with water quality. To our knowledge, no water quality problems have ever been attributed to the existing line. If there are some minimal impacts to water quality during construction, these impacts would only be temporary. The ROW should be stabilized (naturalized) in one or two growing seasons.
- 1492-036 Please see response to Comments 1420-001 and -002.
- 1492-037 and -038 BPA has prepared a SDEIS and has included Chapter 5, entitled "Consultation, Permit and Review Requirements." Within Chapter 5, BPA has discussed consistency with federal, state and local environmental laws, and regulations. Additionally, BPA has published a letter from the Washington Department of Ecology (Appendix V of the SDEIS), stating that "Ecology agrees with your determination and assessment that the proposed action is consistent to the maximum extent practicable with the enforceable policies of Washington's

IMPACT AVOIDANCE, MINIMIZATION, AND MITIGATION

1492-036 SPU believes that no matter which construction alternative is ultimately selected, BPA should commit to constructing a project that uses innovative approaches, designs, and technologies that avoid and minimize adverse impacts to the maximum extent feasible. The SDEIS should specify in detail how BPA intends to do so. The SDEIS should also clearly describe the steps BPA plans to take to fully mitigate the unavoidable adverse impacts associated with each alternative.

CONSISTENCY WITH FEDERAL, STATE, AND LOCAL REGULATIONS AND POLICIES

1492-037 NEPA regulations require that an EIS discuss possible conflicts between the proposed action and the objectives of federal, state, and local land use plans, policies, and controls[40 CFR 1506.2(d)]. However, the SDEIS does not discuss possible conflicts or inconsistencies of its proposed action with approved state and local plans and laws. Where inconsistency exists as, for example, regarding King County's critical areas (streams, wetlands, and buffers) and Shoreline Management provisions, the SDEIS should describe the extent to which the agency would reconcile its proposed action with the plan or law. In this regard, it is not clear from

1492-038 SDEIS Section 5.5.6 just how BPA's compliance with the ESA and coordination with state and federal fish and wildlife agencies would alone achieve consistency with King County's critical area provisions or "meet or exceed the substantive standards and policies" of those provisions. Nor is it clear (in Section 5.8.2) how activities will be coordinated with King County and exactly how consistency with King County's critical areas regulations will be achieved through this "coordination."

CULTURAL RESOURCES

1492-039 The SDEIS asserted that impacts will be "low" for the proposed action. SPU does not believe that the SDEIS contains an adequate amount of information to support this conclusion, and believes that, given the location of Alternative 1, these impacts could be significant. The SDEIS should provide the information needed for a more complete assessment of this issue.

VISUAL RESOURCES

1492-040 BPA's SDEIS states there would be no or low impacts to visual resources for Alternative 1 and that the proposed action would not be visible from state routes 18 or 90. In fact, however, the proposed action would be visible from state routes 18 and 90 (as the existing transmission line is visible), by numerous workers and visitors to the Watershed, and from airplanes. The SDEIS should accurately assess impact to visual resources and commit to mitigation that avoids and minimizes adverse impacts and compensates for unavoidable adverse impacts.

Should you have questions or require further information, please contact Clayton Antieau at 206-233-3711 or Jim Erckmann, at 206-233-1512.

Sincerely,

SUZANNE FLAGOR
Director, Watershed Management
Seattle Public Utilities

cc: Craig Hansen, USFWS
Steve Landino, NMFS
Greg Nichols, Mayor
Chuck Clarke, SPU
Hardev Jui, Seattle City Light

Coastal Zone Management Program and will not result in any significant impacts to the State's coastal resources." With respect to the King County Sensitive Areas Ordinance, Chapter 5 of the SDEIS states that BPA will comply with the substantive intent of the County zoning ordinance.

1492-039 and -040 The cultural resources work conducted for the selected alternative is adequate to conclude that its potential for impacts on these resources is low. The study was exceptionally thorough, starting with background research and a sensitivity analysis that concluded that the routing had a relatively low potential for containing cultural resources. The fieldwork included more than 1,150 subsurface test probes and also involved the participation of the Muckleshoot Indian Tribe in the survey and in interviews about traditional use of the area. The methods and results of the cultural resources study are reported in a lengthy report that is confidential with respect to public distribution but has been reviewed by SPU, the State Office of Archaeology and Historic Preservation, and the Indian tribes. An additional survey will be conducted of newly-identified project features such as roads and staging areas. The report includes an Unanticipated Discovery Plan that provides specific procedures in the event that any artifacts or human remains are found.

We do not believe the new line would be visible from either State Route 18 or from I-90; however, the proposed transmission line would be visible to air traffic flying over or in the vicinity the Cedar River Municipal Watershed. Our SDEIS identified this impact and stated that the impact to visual resources would be low to moderate on views from cars or aircraft, and moderate to high on some Kangley area residents for whom the transmission line would be the dominant visual feature.

The transmission line would be designed to mitigate the visual impacts with darkened steel towers, nonspecular conductors and insulators that are non-reflective.



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Water and Land Resources Division
 Department of Natural Resources and Parks
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RECEIVED
 DATE: KELT-15.65
 RECEIPT DATE: MAR 04 2003

February 28, 2003

Bonneville Power Administration
 KC-7, PO Box 12999
 Portland, OR 97212

To Whom It May Concern:

1515-001 King County Department of Natural Resources and Parks (KCDNRP) is pleased to have the opportunity to comment on the supplemental draft Environmental Impact Statement (SDEIS) for the proposed Kangley-Echo Lake Transmission Line Project. As steward of King County's environment and natural resources, this agency has concerns regarding the extent of analysis performed by the Bonneville Power Administration (BPA) on the impacts of this project on those resources and, in particular, on federally listed salmonids in King County, Washington.

1515-002

1515-003 To date, significant attention in the review of this project has been focused on the Cedar River Watershed. To an extent this is appropriate. Several of the alternatives promise significant impacts to many citizens of unincorporated King County, the river is home to several Endangered Species Act (ESA) listed and unlisted native salmon stocks, and the preferred alternative raises critical issues regarding the protection of the main source of potable water for the region. Specific concerns regarding the first two matters have been raised in previous letters from King County. Those concerns remain relevant and should continue to be accounted for in the review process. Also, it is my understanding that BPA has been engaged in intense negotiation with Seattle Public Utilities (SPU) regarding potential impacts of the proposed project in the upper watershed in close proximity to its water supply diversion. I am hopeful that issues raised regarding potential impacts to the water supply diversion and to natural resources nearby will be addressed in a manner that meets the needs of BPA, SPU, and the natural resources of the upper watershed.

1515-004

1515-005

1515-006

1515-007 It is important, however, to remember that the majority of the proposed alternatives indicate that the new powerline facilities will begin and end in unincorporated King County and that the preferred alternative indicates that approximately half of its land impacts will also occur there. A significant portion of those impacts will occur in the Raging River watershed. The Raging River is a significant local natural resource that will be adversely impacted by the proposed alternatives. The Raging River provides important spawning grounds for the Snoqualmie River population of threatened Puget Sound chinook salmon and coho salmon. Action by the BPA to construct a second Right-of-Way across the Raging River would degrade valuable habitat and could slow local recovery efforts. King County believes that the Raging River should be given similar consideration as the Cedar River and that an analysis should be performed to consider the environmental benefits of doubling the conductors at the crossing site.

1515-008

1515-009

1515-010

1515-011

1515-001 and -002 Comment noted.

1515-003, -004, -005, and -006 Comments noted.

1515-007 Comment noted.

1515-008 Comment noted.

1515-009 and -010 BPA has consulted with the NOAA and NOAA has stated that since the Proposed Action incorporates avoidance and minimization measures into the project design, the effects of the action can be expected to be discountable and insignificant. NOAA has concurred with our effect determination of "may affect, but not likely to adversely affect" for Puget Sound chinook and their designated habitat.

1515-011 See response to Comment 1485-007.

1515-012 King County believes that the Final Supplemental Fisheries Report (Fisheries Report) of the SDEIS does not provide adequate analysis of the potential adverse impacts to chinook and coho populations resulting from each proposed alternative. In fact, the Major Conclusions section (section 1.3) of the report (page 7) states that "All action alternatives would have similar impacts to fish and their habitat." This is not accurate since each alternative proposes crossings at different river locations with different populations of fish and a variety of habitats. Before a final EIS is issued, specific impacts of each alternative should be prepared.


1515-014 The Fisheries Report acknowledges that the clearing of riparian vegetation along the Raging River and other streams with threatened salmonids "could constitute a high impact" (page 39). Recognized impacts such as decreased large woody debris recruitment, decreased riparian shading, increased stream temperatures, and increased bank erosion may result in significant cumulative impacts to fish and their habitats. Yet, the report also states that these conclusions "cannot be confirmed until the extent of clearing needed in the affected areas is known" (page 39). This is important information and should be provided in order to make an informed selection of the alternatives. King County would like to see a more thorough analysis of impacts performed at each of the proposed alternative sites.

1515-016 The Final Supplemental Vegetation Technical Report (Vegetation Report) does not provide an in-depth analysis of riparian clearing needed to accommodate the conductors, overhead ground wires, and insulators designed for each alternative. In order to make an informed decision regarding alternative selection and the impacts of each alternative on vegetation management, more information is needed. For example, if the minimum conductor-to-ground clearance for a 500-kV line is just over 29 feet, what is the allowable distance between vegetation and the conductors? Does the vegetation need to be removed completely even in the riparian areas?

1515-017 In summary, King County Department of Natural Resources and Parks has a specific interest in protecting the Raging River. It is an important tributary to the Snoqualmie River and provides spawning and rearing habitat for threatened salmonids. The current suite of alternatives, in particular the preferred alternative, propose management actions that could have significant adverse impacts to the Raging River and its adjacent riparian area. The state of information and the depth of analysis provided in the SDEIS, the Fisheries Report, and the Vegetation Report do not adequately address these potential impacts. King County requests that BPA conduct a more thorough analysis on the impacts to the Raging River and its salmon populations and present the findings before an alternative is selected.

1515-019 Thank you for the opportunity to comment on the SDEIS for the proposed Kangley-Echo Lake Transmission Line Project. If you have any questions about our comments, please call James Schroeder, Project Manager, in the Water and Land Resources Division with the King County Department of Natural Resources and Parks, at (206) 205-8309.

Sincerely,



Daryl Grigsby
Manager

cc: Rick Kirkby, Manager, Water Resources Unit, King County Department of Natural Resources and Parks (KCDNRP)
Kevin Owens, Manager, Regional Policy Unit, KCDNRP
Harry Reinert, Special Projects Manager, King County Department of Developmental and Environmental Services (KCDDDES)
Mark Solitto, Transfer of Development Rights Program, KCDNRP
Bill Kerschke, Senior Ecologist, Land Use Services Division, KCDDDES
James Schroeder, Project Manager, Water and Land Resources Division, KCDNRP

1515-012 and -013 BPA believes that the analysis of specific impacts has been completed for each alternative, is accurate, and gives the decision maker enough information to make an informed decision.

1515-014 and -015 The Raging River crossing is located across a very deep drainage and in some areas near the river, no vegetation would be cut because there is enough clearance between the line and the river. Some trees may be cut where they could pose a danger to safe operation of the line.

1515-016 The minimum allowable clearance between conductor and vegetation is 20 feet plus the specific vegetative species' growth factor. In general, all tall-growing species would be cut to almost ground level except at specific sensitive areas such as riparian areas where any vegetation could be allowed to grow within the 20 feet plus growth factor to the conductor. So the actual height of the vegetation allowed at riparian areas depends on the actual height of the conductor at that site. Due to the special status of the Cedar River Watershed and its HCP, BPA is willing to work with Seattle to allow young, tall-growing tree species to remain longer before cutting to create a taller habitat without creating a hazard for the transmission line. If possible, no low-growing vegetation species will be cut near riparian areas during construction.

1515-017, -018, and -019 BPA believes that the analysis of specific impacts has been completed for each alternative, is accurate, and gives the decision maker enough information to make an informed decision. Because of the presence of endangered species in the area including chinook salmon in the Raging River, BPA prepared a biological assessment and entered into Section 7 consultation with NMFS in July 2001. This consultation was completed on January 28, 2002, with their finding that "Since the proposed action incorporates avoidance and minimization into the project, NMFS can expect the effects of the action to be discountable or insignificant. Therefore NMFS concurs with your effect determination of "may effect, but not likely to adversely affect" for Puget Sound Chinook and their designated habitat.

Please see response to Comments 1515-014 and -015.



Providing quality water, power and service at a competitive price that our customers value

MAR 04 2003 February 28, 2003

Bonneville Power Administration
Public Affairs - KC
P.O. Box 12999
Portland, Oregon 97212

BPA Representative:

1516-001 Public Utility District No. 1 of Snohomish County ("District") has reviewed the Supplemental Draft Environmental Impact Statement Summary DOE/EIS-0317-S1 and applicable appendices. The District comments will focus on the need for transmission reinforcements in the Puget Sound area and not on the specific corridor and facility alternatives proposed to implement the Northwest transmission system reinforcement.

1516-002 The District actively participated in a number of Northwest transmission planning activities including the Bonneville Power Administration Infrastructure for Technical Review Committee ("ITRC"). This committee was formed to evaluate needs for significant transmission addition in the Northwest, including the Kangley Echo Lake transmission line project. BPA evaluated numerous alternatives with electric industry representatives. The ITRC evaluated and scrutinized the projects to ensure that they would resolve existing system deficiencies as well as provide for future needs. The "Puget Sound Area Additions Project," also known as "G1 Project," includes the Kangley-Echo Lake 500-kV line as well as the SnoKing 500/230-kV bank addition which will be located in Snohomish County. These projects carefully coordinated with other planned projects, including the second 500kV line between Monroe - Echo Lake known as the "I-5 Corridor G8 Project". The Northwest electric utilities have developed and supported these electric system plans to benefit the Puget Sound and Northwest.

1516-003 These projects, in conjunction with other planned projects, will increase the system load service capacity, level of service, and transfer capability in the Puget Sound area. Without these "G" projects, BPA will not be able to meet its obligation under the "Columbia River Treaty and Return of the Canadian Entitlement" or the transmission load service obligations to Puget Sound area electric utilities. Significant transmission congestion and curtailments have already caused material economic impacts to the region. The region to date has capitalized on the use of reactive additions and Remedial Action Schemes ("RAS") to provide small incremental capacity additions to avoid major transmission expansion. However, 15 years of major growth in the Northwest with no substantial transmission expansion has severely burdened the existing transmission system. The District is in agreement with BPA and many other Northwest electric utilities, that it is time to expand the transmission system before the system is gridlocked and the economic and environmental ramifications of resolving the problems are insurmountable. Therefore, the District strongly supports the proposed projects; the District does not however, endorse or oppose any particular installation plan or location for the much-needed improvements.

1516-004 Thank you for the opportunity to comment on the Supplemental Draft Environmental Impact Statement DOE/EIS-0317-S1 and applicable appendices

If you have any questions, please contact John Martinsen, Principal Engineer, System Planning and Protection, at 425-783-4327.

Sincerely,

Ignacio Castro, Jr.
Manager, System Planning and Protection
Distribution Services Division
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425-783-1000 • Toll-free in Western Washington at 1-877-783-1000 • www.snopud.com

1516-001 Comments noted.

1516-002 Comments noted.

1516-003 Comment noted.

1516-004 Comment noted.

1516-005 Comment noted.